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October 27, 2023

BY ECF and Email

Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Request GRANTED. SO ORDERED.

Dated: October 27, 2023

Re: *United States v. Luciano*, 23 Mag. 2782

Dear Judge Aaron:

I represent defendant Angelica Luciano in the above-referenced case. I write to request a modification of the bond that currently governs Ms. Luciano's pre-trial release. This is my fourth request for a modification of the terms of Ms. Luciano's release and I write with the consent of the government and Pretrial Services.

In my initial request for a modification of the terms of Ms. Luciano's release, I asked the Court to fine tune language in order to facilitate her visitation with her children under appropriate supervision. I also asked that Ms. Luciano be evaluated for mental-health issues and treated, if appropriate. The request was "so ordered." In the second request, I sought a replacement of home detention with compliance with an appropriate curfew to be set at the discretion of Pretrial Services. Location monitoring, however, was to continue. That request was also "so ordered."

In this request, I seek permission for Ms. Luciano to move from her current abode with her mother to live in a shelter that does not house children. Because of the instant criminal proceeding Ms. Luciano's continued presence in her mother's apartment risks eviction for her mother. Curfew and GPS monitoring would continue as before. Also, Ms. Luciano's mother would remain a third-party custodian for the purpose of any Pretrial-approved visitation between Ms. Luciano and a minor, though, as made clear above, she would not be living with Ms. Luciano. Pretrial Services consents to this modification, as does the government.

We thank the Court in advance for its consideration of these matters.

Respectfully submitted,

/s/

Dawn M. Cardi